

June 1, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



RE:

Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, (a Division of Integrative Therapeutics, Inc.), Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS.
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy Enfusion™	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Biotin, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Whey Protein, Malic Acid, Inositol, Inulin, Hesperidin, Taurine, Glycine, L-Tyrosine, N-Acetylcysteine, L-Serine, Boron	Vitamin D (as cholecalciferol): Supports healthy metabolism of calcium and phosphorus; supports the absorption of vitamin A; supports bone mineralization.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: KIRRILL

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 10/1/03

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825 CHALLENGER DRIVE GREEN BAY, WI 54311-8328 920-469-9099 TOLL FREE 800-553-2370 FAX 920-469-4418 FAX TOLL FREE 888-311-5657 WWW.PHYTOPHARMICA.COM

End Fatigue Daily Energy Enfusion 36p

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If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

Michael P. Devereux Chief Financial Officer



June 2, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica substantiation that the statements are truthful and not misleading.

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 6/2/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

Michael P. Devereux Chief Financial Officer



June 3, 2003

Mr. Robert Moore Office of Nutritional Products, Labeling & Dietary Supplements, HFS 811 Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740

Label Claims/Disclaimers RE:

Dear Mr. Moore:

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Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	End Fatigue™ Daily Energy Enfusion™	Vitamin A, Vitamin C, Vitamin D, Vitamin E, Biotin, Iodine, Magnesium, Zinc, Selenium, Copper, Manganese, Chromium, Molybdenum, Sodium, Potassium, Whey Protein, Malic Acid, Inositol, Inulin, Hesperidin, Taurine, Glycine, L-Tyrosine, N-Acetylcysteine, L-Serine, Boron	Magnesium (as magnesium glycinate): Supports enzyme activity involved in energy production; supports healthy nerve and muscle function; supports healthy immune system functions.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica substantiation that the statements are truthful and not misleading.

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: <u>6/3/03</u>

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608

Sincerely,

Michael P. Devereux Chief Financial Officer



June 4, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

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I certify that the information contained in this notice is complete and accurate and that PhytoPharmica substantiation that the statements are truthful and not misleading.

By: XI YU IL L

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: <u>6/4/03</u>

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs (920) 406-3608

Sincerely,

Michael P. Devereux

Chief Financial Officer